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April 16, 2003

Paul C. Besozzi  
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**BY FEDERAL EXPRESS**

Mary L. Cottrell  
Secretary  
Massachusetts Department of Telecommunications and Energy  
One South Station, 2nd Floor  
Boston, MA 02110

Re: **D.P.U./D.T.E. 97-88/97-18 (Phase II) – Motion For Further  
Extension Of Time To File Comments**

Dear Ms. Cottrell:

Enclosed for filing is a "Motion For Further Extension Of Time To File Comments" from the New England Public Communications Council, Inc.

An extra copy of the Motion is enclosed to be stamped "filed" or "received" and returned in the enclosed envelope.

Sincerely yours,

A handwritten signature in black ink, reading 'Paul C. Besozzi', followed by a horizontal line.

Paul C. Besozzi  
PCB/tmc

Enclosures

cc: Service List

**Before the  
Department of Telecommunications and Energy  
Commonwealth of Massachusetts**

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Investigation by the Department of  
Telecommunications and Energy on its  
own motion regarding (1) implementation  
of Section 276 of the Telecommunications  
Act of 1996 relative to Public Interest  
Payphones, (2) Entry and Exit Barriers  
for the Payphone Marketplace, (3) New  
England Telephone and Telegraph  
Company d/b/a NYNEX's Public Access  
Smart-Pay Line Service, and (4) the rate  
policy for operator service providers.

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D.P.U./D.T.E. 97-88/97-18 (Phase II)

**Motion For Further Extension Of Time To File Comments**

On February 21, 2003, the Hearing Officer issued a Memorandum requesting, among other things, that (a) Verizon-Massachusetts ("Verizon") file certain proposed revised PAL and PASL rates on March 3, 2003 and (b) that the New England Public Communications Council, Inc. ("NEPCC") and other interested parties file initial comments on two questions raised in the Memorandum by March 14, 2003; reply comments were to be due by March 21, 2003. Pursuant to Motions granted by the Hearing Officer on March 5, 2003, March 24, 2003 and April 14, 2003, those dates were extended to April 17, 2003 and May 1, 2003, respectively.

In accordance with Section 1.02(5) of the Department's Procedural Rules, 220 CMR Section 102(5), the NEPCC respectfully moves for an additional extension of time, so that the deadlines for filing comments would be further extended to Friday, April 25, 2003 and Tuesday, May 13, 2003, respectively. The NEPCC seeks this additional extension because late on Tuesday, April 15, 2003, Verizon filed modifications to its March 3, 2003 PAL/PASL Reprice. These modifications will

require substantive reassessment of positions taken by the NEPCC in comments and analyses already prepared for filing on April 17, including further consultation with its expert. In addition, with respect to reply comments, counsel for the NEPCC and its President will be attending the annual American Public Communications Council payphone industry meeting from May 6-9, 2003. In light of the extensive time and resources already expended in this proceeding to date, this additional time is warranted because it would not prejudice any of the parties in this proceeding. Counsel for Verizon has authorized the undersigned counsel to represent that she has no objection to this request for additional time. Further, the undersigned counsel is not aware of any objections that might be raised by any other interested party to the further proposed extension requested.

**WHEREFORE**, the NEPCC respectfully moves that the time to file comments in accordance with the Memorandum be extended to Friday, April 25, 2003 for initial comments and Tuesday, May 13, 2003 for reply comments.

Respectfully submitted,

**NEW ENGLAND PUBLIC  
COMMUNICATIONS COUNCIL, INC.**

By: 

Paul C. Besozzi  
Patton Boggs LLP  
2550 M Street, N.W.  
Washington, DC 20037  
(202) 457-5292

**CERTIFICATE OF SERVICE**

I, Paul C. Besozzi, hereby certify that I have this 16th day of April 2003, served a copy of the foregoing **"Motion For Further Extension Of Time To File Comments"** in MDTE Docket D.P.U./D.T.E. 97-88/97-18 (Phase II), upon the following parties by electronic and first class mail or overnight courier:

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